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Proskauer Rose LLP 2049 Century Park East, 32nd Floor Los Angeles, CA 90067-3206

November 7, 2012

By CM/ECF

Honorable Joseph C. Spero  
United States District Court  
Northern District of California  
450 Golden Gate Avenue,  
Courtroom G-15<sup>th</sup> Floor  
San Francisco, CA 94102

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Re: *Christopher O'Sullivan v. AMN Services, Inc.; Alice Ogues v. AMN Services, LLC*,  
Case No. cv-12-2125 JCS

Dear Judge Spero:

The parties respectfully submit this joint letter pursuant to your September 6, 2012 Case Management and Pretrial Order (Dkt. No. 31) to advise you of the date of a private mediation and to propose a briefing schedule for a motion for class certification.

*First*, the parties have agreed to hold a private mediation on March 28, 2013 with mediator Mark Rudy.

*Second*, the parties have agreed on the following proposed briefing schedule for a motion for class certification. Defendants' reserve their right to file a *Vinole* motion, which the parties agree, would follow the same schedule if filed:

|                    |   |
|--------------------|---|
| August 9, 2013     | Deadline to File Motion for Class Certification                     |
| September 20, 2013 | Deadline to File Opposition to Motion for Class Certification       |
| October 11, 2013   | Deadline to File Reply in Support of Motion for Class Certification |
| November 8, 2013   | Hearing on Motion for Class Certification                           |

Sincerely,

  
\_\_\_\_\_  
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Los Angeles, CA 90067

*Attorneys for Defendants*  
AMN Services, LLC, improperly  
named herein as "AMN Services, Inc.  
dba MEDICAL EXPRESS," AMN  
Healthcare, Inc. and AMN Healthcare  
Services, Inc.

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\_\_\_\_\_  
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Alice Ogues

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David Spivak, Esq. (by e-mail)  
Louis Benowitz, Esq. (by e-mail)

Dated: 11/15/12

